

SERVICE OF RESPONSE
UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

BANKRUPTCY CASE No. 1-300088
CHAPTER 11

PG&E CORPORATION and PACIFIC GAS AND ELECTRIC COMPANY, Debtors

*Affects both Debtors

REGARDING NOTICE OF THE REORGANIZED DEBTORS FOR THIRD OMNIBUS CLAIMS

VS

WILLIE AND ORA GREEN, Creditors

Claim No. 80673

2845 Magnolia Street

Oakland CA 94608

510 893-4251

ogr53@gmail.com

We respectfully petition the court for motion to request PG&E to settle claim presented for property damages to owners, at a fair and reasonable amount within a timely manner, not to allow claim to continue indefinitely without settlement.

QUESTION PRESENTED

1. PG&E SEEKS TO DISALLOW OR EXPUNGE CLAIMS PRESENTED BY PROPERTY OWNERS/CREDITOR FOR DAMAGE OF PROPERTY.

WE OPPOSE

1. PG&E DISALLOWANCE AND EXPUNGE TO AVOID RESPONSIBILITY FOR DAMAGE CAUSED BY PG&E WORKERS TO THE PROPERTY LOCATED AT 2845 MAGNOLIA STREET OAKLAND CA DRIVEWAY AND GARAGE FLOOR.

WE OPPOSE

2. PG&E REFUSAL TO COMPENSATE OWNERS IN A FAIR AND REASONABLE AMOUNT ON CLAIM TO SETTLE FOR PROPERTY DAMAGES EVEN WHEN OWNER REPORTED DAMAGES TO PG&E.

WE OPPOSE

3. PG&E REFUSAL TO SETTLE CLAIM IN A TIMELY MANNER THUS LENGTHENED RESPONSE TIME TO RESOLVE ISSUE REGARDING COMPENSATION FOR DAMAGES TO PROPERTY EVEN THOUGH PG&E WAS AWARE OF DAMAGE TO PROPERTY AND CLAIMS WERE PRESENTED ALONG WITH ESTIMATES ON COST TO FIX DAMAGE.

We declare under penalty of law that the knowledge and facts of this case evidence supporting of all events are given to support the response are truthful and to best of our knowledge as being present when they occurred

Continued Response:

October 19, 2021 at 10:00 a.m.

via Tele/Video conferencing appearance only

Willie and Ora Green 2845 Magnolia Street Oakland CA 94608

Claim# 19-30088 510 893-4251 ogr53@gmail.com

Small Residential Income Property Appraisal Report

The purpose of this summary appraisal report is to provide the lender/client with an accurate, and adequately supported, opinion of the market value of the subject property.											
Property Address 2845 MAGNOLIA STREET				City EMERYVILLE		State CA Zip Code 94608-4445					
Borrower WILLIE GREEN		Owner of Public Record		GREEN,WILLIE		County Alameda					
Legal Description BK.23 Pg 72											
Assessor's Parcel No. APN# 005-0458-014-01						Tax Year 2013		R.E. Taxes \$ 4,101.46			
Neighborhood Name Oakland/Emeryville		Map Reference 649/F1				Census Tract 4015.00					
Occupant <input checked="" type="checkbox"/> Owner <input type="checkbox"/> Tenant <input type="checkbox"/> Vacant		Special Assessments \$ None		PUD		HOA \$ N/A		per year		per month	
Property Rights Appraised <input checked="" type="checkbox"/> Fee Simple <input type="checkbox"/> Leasehold <input type="checkbox"/> Other (describe)											
Assignment Type <input type="checkbox"/> Purchase Transaction <input checked="" type="checkbox"/> Refinance Transaction <input type="checkbox"/> Other (describe)											
Lender/Client First Bank Mortgage Address 1 First Missouri Center St Louis, MO, 63141											
Is the subject property currently offered for sale or has it been offered for sale in the twelve months prior to the effective date of this appraisal? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No											
Report data source(s) used, offerings price(s), and date(s). EBRDMLS											

I did did not analyze the contract for sale for the subject purchase transaction. Explain the results of the analysis of the contract for sale or why the analysis was not performed.

Contract Price \$	Date of Contract	Is the property seller the owner of public record? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Data Source(s)		
Is there any financial assistance (loan charges, sale concessions, gift or down payment assistance, etc.) to be paid by any party on behalf of the borrower? <input type="checkbox"/> Yes <input type="checkbox"/> No				
If Yes, report the total dollar amount and describe the items to be paid.				

Note: Race and the racial composition of the neighborhood are not appraisal factors.

Neighborhood Characteristics			2-4 Unit Housing Trends			2-4 Unit Housing			Present Land Use %	
Location <input checked="" type="checkbox"/> Urban <input type="checkbox"/> Suburban <input type="checkbox"/> Rural	Property Values <input checked="" type="checkbox"/> Increasing <input type="checkbox"/> Stable <input type="checkbox"/> Declining		PRICE	AGE	One-Unit	85 %				
Built-Up <input checked="" type="checkbox"/> Over 75% <input type="checkbox"/> 25-75% <input type="checkbox"/> Under 25%	Demand/Supply <input checked="" type="checkbox"/> Shortage <input type="checkbox"/> In Balance <input type="checkbox"/> Over Supply		\$ (000)	(yrs)	2-4 Unit	10 %				
Growth <input checked="" type="checkbox"/> Rapid <input type="checkbox"/> Stable <input type="checkbox"/> Slow	Marketing Time <input checked="" type="checkbox"/> Under 3 mths <input type="checkbox"/> 3-6 mths <input type="checkbox"/> Over 6 mths		525	Low	32	Multi-Family	0 %			
Neighborhood Boundaries The subject neighborhood is bounded by Alcatraz Ave. to the North, FRWY 880 to the South, FRWY 880 to the West and FRWY 580 to the East.			830	High	121	Commercial	0 %			
			610	Pred.	110	Other Vacant	5 %			

Neighborhood Description This section of Oakland is primarily a residential community from average to good homes. Higher levels of maintenance were noted at the time of inspection. The commercial properties are retail establishments that provide supporting services. Highly regarded for the schools, and major shopping are nearby as are other supporting services. Employment Centers in the area are 5 to 10 minutes distant via public transportation, BART local roads, Interstate 580, and 880. Due to lack of rental units in subject market area rent are on the high demand.

Market Conditions (including support for the above conclusions) See Comment Addendum.

Dimensions	54.5x96.6	Area	5,265 SqFt	Shape	Rectangular	View	City View
Specific Zoning Classification	R-30	Zoning Description	Single Family Residential				
Zoning Compliance <input checked="" type="checkbox"/> Legal <input type="checkbox"/> Legal Nonconforming (Grandfathered Use) <input type="checkbox"/> No Zoning <input type="checkbox"/> Illegal (describe)							

Is the highest and best use of subject property as improved (or as proposed per plans and specifications) the present use? Yes No If No, describe.

Utilities Public Other (describe)	Public	Other (describe)	Off-site Improvements-Type			Public	Private
Electricity <input checked="" type="checkbox"/>	<input type="checkbox"/>	Water <input checked="" type="checkbox"/>	Street <input type="checkbox"/>	Asphalt <input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gas <input checked="" type="checkbox"/>	<input type="checkbox"/>	Sanitary Sewer <input checked="" type="checkbox"/>	Alley <input type="checkbox"/>	None <input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
FEMA Special Flood Hazard Area <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	FEMA Flood Zone <input checked="" type="checkbox"/>	X	FEMA Map #	06001C0058G	FEMA Map Date	08/03/2009	

Are the utilities and off-site improvements typical for the market area? Yes No If No, describe.

Are there any adverse site conditions or external factors (easements, encroachments, environmental conditions, land uses, etc.)? Yes No If Yes, describe.

No adverse easements or encroachments noted at the time of inspection, Normal utility easements are assumed.

General Description			Foundation		Exterior Description		materials/condition		Interior		materials/condition	
Units <input checked="" type="checkbox"/> Two <input type="checkbox"/> Three <input type="checkbox"/> Four	Concrete Slab <input checked="" type="checkbox"/>	Crawl Space <input checked="" type="checkbox"/>	Foundation Walls	Concrete/Good	Floors	Hrdw/Carp/Good						
Accessory Unit (describe below)	Full Basement <input type="checkbox"/>	Partial Basement <input type="checkbox"/>	Exterior Walls	Wood/Good	Walls	Drywall/Average						
# of Stories 1 # of bldgs. 2	Basement Area 0	sq. ft.	Roof Surface	Comp. Shingle/Average	Trim/Finish	Paint/Wood/Avg						
Type <input checked="" type="checkbox"/> Det. <input type="checkbox"/> Att. <input type="checkbox"/> S-Det./End Unit	Basement Finish <input type="checkbox"/>	%	Gutters & Downspouts	Aluminum/Good	Bath Floor	Vinyl/Avg						
<input checked="" type="checkbox"/> Existing <input type="checkbox"/> Proposed <input type="checkbox"/> Under Const.	<input type="checkbox"/> Outside Entry/Exit <input type="checkbox"/>	<input type="checkbox"/> Sump Pump	Window Type	Dbl-hung/Good	Bath Wainscot	Ceramic/Average						
Design (Style) Bungalow	Evidence of <input type="checkbox"/>	Infestation <input type="checkbox"/>	None	Storm Sash/Insulated Yes/Avg	Car Storage							
Year Built 1982	Dampness <input type="checkbox"/>	Settlement <input type="checkbox"/>	Screens <input type="checkbox"/>	Yes/Avg	Car Storage <input type="checkbox"/>	None <input type="checkbox"/>						
Effective Age (Yrs) 10	Heating/Cooling			Amenities	<input checked="" type="checkbox"/> Driveway	# of Cars 2						
Attic <input type="checkbox"/> None <input type="checkbox"/>	FWA <input type="checkbox"/>	X HWBB <input type="checkbox"/>	Radiant <input type="checkbox"/>	Fireplace(s) # <input type="checkbox"/>	Woodstove(s) # 0	Driveway Surface Concrete						
Drop Stair <input type="checkbox"/> Stairs <input type="checkbox"/>	Other <input type="checkbox"/>	Fuel Gas <input type="checkbox"/>		Patio/Deck <input checked="" type="checkbox"/>	Fence Wire <input type="checkbox"/>	<input checked="" type="checkbox"/> Garage # of Cars 2						
Floor <input checked="" type="checkbox"/> Scuttle <input type="checkbox"/>	Cooling <input type="checkbox"/>	Central Air Conditioning <input checked="" type="checkbox"/>		Pool <input type="checkbox"/>	Porch Wood <input type="checkbox"/>	Carport # of Cars						
Finished <input type="checkbox"/> Heated <input type="checkbox"/>	Individual <input type="checkbox"/>	Other <input type="checkbox"/>	None <input type="checkbox"/>	Other None <input type="checkbox"/>		<input checked="" type="checkbox"/> Att. <input type="checkbox"/> Det. <input type="checkbox"/> Built-in						
# of Appliances Refrigerator <input checked="" type="checkbox"/> x Range/Oven <input type="checkbox"/> x Dishwasher <input type="checkbox"/>	Disposal <input type="checkbox"/>	Microwave <input type="checkbox"/>	Washer/Dryer <input checked="" type="checkbox"/> x	Other (describe) <input type="checkbox"/>								
Unit #1 contains: 6 Rooms 3 Bedroom(s) 2.00 Bath(s) 1,377												
Unit #2 contains: 5 Rooms 2 Bedroom(s) 1.00 Bath(s) 848												
Unit #3 contains: Rooms Bedroom(s) Bath(s)												
Unit #4 contains: Rooms Bedroom(s) Bath(s)												
Additional features (special energy efficient items, etc.) See comment												

Describe the condition of the property (including needed repairs, deterioration, renovations, remodeling, etc.). Both of the units were owner occupied at the time of inspection per owner. All unit were recently modernized as needed and all utilities are in good working order at the time of inspection. All utilities were reported to be on and mechanical systems were working properly including safety release latches, electrical, and plumbing at the time of inspection. No observable or otherwise known negative condition exist which would impact the subject.

Instructions: Responding to a Motion to Dismiss the Complaint

This template was prepared by the Justice & Diversity Center, a nonprofit organization, and is not an official court form. It can be used in certain civil lawsuits in the Northern District Court of California. *Using this template does not guarantee any result in your case.*



HOW TO GET LEGAL INFORMATION AND ADVICE

This packet provides general guidance about opposing a motion to dismiss. *Before filing this document*, make an appointment for free legal information and advice at one of the Legal Help Centers.



If the case is assigned to a judge in the San Francisco, Oakland, or Eureka federal courthouse, do one of the following:



Call the appointment scheduling line for the Federal Pro Bono Project: 415-782-8982



Sign up in the appointment book at either:

450 Golden Gate Ave., 15th Floor, Room 2796, San Francisco or
1301 Clay Street, 4th Floor, Room 470S, Oakland



Email us at federalprobonoproject@sfbar.org

This email is to schedule appointments only-no legal advice is given over email.



If the case is assigned to a judge in the San Jose federal courthouse, do one of the following:



Call the appointment scheduling line for the Federal Pro Se Program: 408-297-1480



Monday to Thursday 9:00 am - 12:00 pm, drop in at

The Law Foundation of Silicon Valley, 152 North 3rd St., 3rd Floor, San Jose

Monday to Thursday 1:00 pm - 4:00 pm, drop in at
280 South 1st Street, 2nd Floor, Room 2070, San Jose



WHEN TO RESPOND TO A MOTION

You have only 14 days to respond to a motion.  The time to respond runs from the date the motion was filed. Check the certificate of service, which should be attached to or included with the Motion papers.



DECIDE HOW TO RESPOND TO THE MOTION

If you have not already filed an amended complaint, and you think you can fix the problems the Defendant identified in the Motion to Dismiss, you may be able to file an Amended Complaint instead of an Opposition. Make an appointment at the Legal Help Center (see page 1) for advice. The deadline for filing an Amended Complaint is the same as the deadline for filing an Opposition.



HOW TO COMPLETE THIS OPPOSITION TO MOTION TO DISMISS TEMPLATE

- Fill in the case information.** Fill in all blanks on the first page. The date and time for the motion hearing can be found on the Defendant's Motion.
- Write in the facts.** Write a short version of the facts you wrote in the Complaint. If there are facts that you did not include in the Complaint, but might make a difference in whether the Court dismisses your Complaint or not, add them here.
- Respond to each of the Defendant's arguments.** A defendant usually makes several points in the "Argument" section of its Motion to Dismiss. You should respond to each point. Most Memoranda cannot be longer than 15 pages (excluding title page). If you have questions about the arguments or how to respond to them, or are concerned about going over the page limit, contact the Legal Help Center (see page 1).
- Add required pages.** If your Opposition is longer than 10 pages (excluding title page), you must include a table of contents and table of authorities; these should be inserted immediately after the title page. If the judge in your case requires it, you may need to submit a proposed order. Review the judge's Standing Order and Scheduling Orders: <http://www.cand.uscourts.gov/judges>.
- Review, number the pages, and sign.** Read the entire document to make sure it is clear, correct and complete. Fill in the page numbers and the total on each page. Sign and date.
- Prepare the Certificate of Service.** Each document that you file must be "served" on each other party, usually by sending it in the mail. Follow the instructions on the Certificate of Service.
- Mark your calendar.** Put the hearing date on your calendar, and be sure to show up at Court. *You must follow whatever decision is made at or after the hearing and any instructions from the Court.*

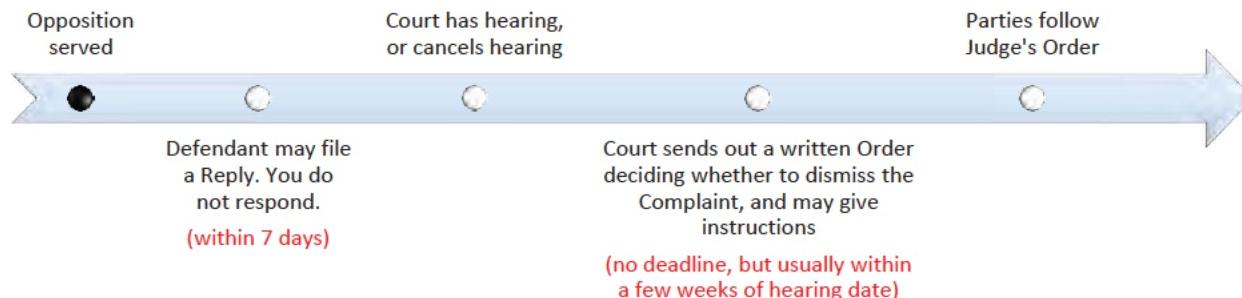


FILING AND SERVING YOUR OPPOSITION PAPERS

1. **Make copies.** Once the documents are complete, make three copies of each. On one copy of the documents, write "Chambers" on the top in pen. If there is more than one plaintiff or defendant, you will also need one copy for each of them.
2. **File the Opposition.** Deliver or mail the *original plus two copies* of the Opposition and the Certificate to the Clerk's Office at the courthouse where the Judge for your case is located. The Clerk will take the original and one copy. The other copy is for you to keep after it is stamped by the Clerk. If you file by mail, include a self-addressed, stamped envelope so that the Clerk can send a copy back to you.
3. **Serve the Opposition.** Be sure the Opposition and Certificate are served on each party.

→ TIMELINE: AFTER OPPOSITION PAPERS ARE FILED

The timeline below lists what generally happens after the Opposition is filed. The Legal Help Centers (see page 1) can provide guidance about these steps, and have many other templates for you to use in your case.



STAY UP TO DATE

- Update your contact information.** File a notice with the Clerk right away if your address, email, or phone number changes, or you may miss important deadlines, causing you to lose your case.
- Check your mail.** Be sure to check regularly for documents from the Court and opposing side.
- A list of all of the documents that have been filed, and (usually) the documents themselves can be viewed online. See Chapter 7 of the Handbook for Pro Se Litigants (see below), and contact the Legal Help Center for information about how to access the documents (see page 1).



UNDERSTANDING THE LAWS AND RULES

The Legal Help Centers (see page 1) are the best resource for people without lawyers. There are other resources for understanding the laws and rules of the Court:

- Handbook for Pro Se Litigants.** The Handbook is a procedural guide for people who are representing themselves. It was prepared by the Court and is available at the Clerk's Office or on the Court's website at www.cand.uscourts.gov/prosehandbk.
- Legal Research Guide for Pro Se Litigants.** The Guide provides information for people who are representing themselves about how to do legal research, like finding statutes and decisions in other cases. It was prepared by the Justice & Diversity Center and is available at the Legal Help Centers and at www.cand.uscourts.gov/Legal-Help-Center-Templates.
- Federal Rules of Civil Procedure.** These Rules explain the procedures from filing through trial for all civil cases in the federal courts across the country, and are available at www.uscourts.gov/sites/default/files/rules-of-civil-procedure.pdf.
- Local Rules.** The Local Rules follow the same numbering as the Federal Rules of Civil Procedure, but generally provide more detail. They apply in this District only, and are available at www.cand.uscourts.gov/localrules/civil.

1 Your name: Willie & Ora Green

2 Address: 2845 Magnolia Street

3 Oakland CA 94608

4 Phone Number: 510 893-4251

5 E-mail Address: orgr53@gmail.com

6 Pro se

7

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 Division [check one]: San Francisco Oakland San Jose Eureka

11

12 WILLIE & ORA GREEN } Case Number: 19-30088

13 Creditors })

14 Plaintiff, }) **OPPOSITION TO MOTION TO DISMISS**

15 vs. })

16 PG&E CORPORATION } DATE: 10/14/2021

17 PACIFIC GAS AND ELECTRIC } TIME: 10:00

18 Debtors } JUDGE: Hon. Dennis Montali

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21 Defendant. })

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OPPOSITION TO MOTION TO DISMISS

CASE NO.: 19-30088

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[JDC TEMPLATE - rev. 2017]

FACTUAL BACKGROUND

[Write a short version of the facts in the Complaint. After each fact, write in the paragraph number of the Complaint where that information can be found.]

3 During the PG&E mandated gas line replacement in Oakland CA in 2016 - 2017 . PG&E started
4 very heavy intense construction in our street. During that construction program PG&E staged daily
5 heavy equipment in front of the gates of my house causing very heavy intense sound and vibrations.
6 I had to close my gates because they were turning around on my driveway at 2845 Magnolia Street
7 See Exhibit #A shows heavy equipment and staging in front of house and steam roller using
8 driveway to turnaround and cracks running from the street onto our driveway to go under the
9 garage door cracking the garage floor. PG&E then cut a 3 x 5 hole in my driveway without
10 notification to the owners who were home, the cars were in the driveway at that time. The workers
11 removed the steel rebar and stabilizing filling and covered the 3 x5 hole with blacktop. We saw
12 this when we came out of the house later, but we no one spoke to us before or during the work
13 being done. PG&E own notice to home owners state owners are to be notified before this type or
14 alterations are make to property. I called PG&E about the 3 x 5 hole being cut and the cracks
15 in the driveway and the garage floor after I spoke to one of the workers on the site who said call
16 PG&E. I called, did a claim on line and PG&E sent a worker not a investigator to look at the
17 damage. He said they didn't do it and walked out. I didn't hear from PG&E. Exhibit # B PG&E
18 notice to property owners regarding work, notification regarding claim. Later a representative called,
19 questioned and verified with me about what had happened, then she worked on the claim.
20 PG&E never sent a representative to conduct a proper investigation and to actually see what had
21 happened. I proceeded to get quotes and a investigative report from a structural engineer because
22 of the cracks running up to the house in the garage and in the house which was presented to PG&E.
23 Years later PG&E offered \$500- \$1500 to settle. The estimates are for more. I offered to lower
24 the amount and PG&E refused in written settlement and at a Zoom mediation meeting. It was made
25 known PG&E refuses to acknowledge damage to driveway and garage floor or settle for a fair amour
26 Meeting ended in a stalemate.

OPPOSITION TO MOTION TO DISMISS

CASE NO.: 19-30088

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[JDC TEMPLATE – rev. 2017]

ARGUMENT

[Explain your response to each of Defendant's arguments. Go in the same order as the arguments were made in Defendant's Motion, if possible.]

3 Willie and Ora Green are the owners of the property that PG&E workers entered on to perform
4 gas line replacement, alterations to property was done without knowledge or permission of the
5 property owners, the Greens. We have only been made aware of Ms. Jensen as the investigator after
6 years of this issue regarding the damage because we were never contacted by anyone from PG&E
7 except for the two gas line workers to look into this situation. PG&E only contacted us regarding
8 possible damage to our sewer lines resulting from the gas line replacement in 11/2021.

#5 Ms Jensen claims that after PG&E workers first came on the property and cut a 3x5 hole in the driveway without notification to the owners with a car in the driveway and children present. The unidentified man was told to leave and get his supervisor, to speak to the property owners about what they were going to do this time to the driveway. As the owner I believe I have the right to know. PG&E never contacted the property owners to address the damage they caused to the driveway or garage floor. Even under Rule 16 PG&E does not have the right to come onto property without notifying the owners to do work beyond the scope of their routine or emergency duties or to alter or cause damage to property of their customers. Ms Jensen was made aware that driveway was not the original one it had been replaced with one that was thicker, reinforced steelbar and gravel for a upgraded protection. And my house was also on the market to sell before the damage to the driveway and garage floor. Ms Jensen reply my house is old and all garage driveways and garage floors crack hers did, comparing her situation with ours. The only problem is PG&E cracked our driveway causing the cracking of the garage floor. I was also told anyone can get a structural report, but PG&E didn't take the effort at the time the damage occurred.

#7 At no time were the owners notified by phone or by mail that ARB was to make repairs. No
25 contacted the home owners period. That included PG&E regarding ARB.

#8 During the Zoom mediation Ms Jensen was not aware of many facts of the case and was not able
answer or give a reasons for what had taken place by PG&E and ARB workers.

#8 I presented her and PG&E with several pictures of the front of the house showing the driveway,

OPPOSITION TO MOTION TO DISMISS

CASE NO. 19-30088

: PAGE 3 OF 4

[JDC TEMPLATE – rev. 2017]

1 the black top 3x5 patch, the heavy construction equipment staging in front of the house, the steam
2 roller backing up into the driveway, as well as structural engineer reports show how structural
3 weight failure causes cracking of concrete because of vibration of heavy equipment being used
4 on or too close to causing damage.

5
6 We had home inspections, which commented on the condition in 2014 and 2015 of our property,
7 none the inspections mention cracks in the driveway or garage floor at the time with items needing
8 attention or repairs for preparation for business purposes.

9
10 #9 and #10 Ms Jensen presents the pictures of the front of 2845 Magnolia Street, which I sent to her :
11 and to PG&E several times, the pictures I sent had cracks from the work caused during the time
12 PG&E gas line program was working on Magnolia Street. Earlier pictures I viewed did not show
13 the cracks.
14

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24 [If this document is longer than ten pages, you must include a table of contents and a table of authorities.]

25 [You must sign and date.]

26 Date: 10/14/2021 Sign Name: _____

28 Print Name: Willie and Ora Green

OPPOSITION TO MOTION TO DISMISS

CASE NO.: 19-30088

; PAGE ⁴ OF ⁴

[JDC TEMPLATE - rev. 2017]

1 Insert this page as needed to continue the facts or argument section, or to write an introduction.
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OPPOSITION TO MOTION TO DISMISS

CASE NO.: 19-30088

Case: 19-30088 Doc# 11429 Filed: 10/14/21 Entered: 10/15/21 10:21:47 Page 10
of 13 ; PAGE 4 OF 4 [JDC TEMPLATE - rev. 2017]

CERTIFICATE OF SERVICE OF DOCUMENT OTHER THAN COMPLAINT

** You must serve each document you file by sending or delivering to the opposing side. Complete this form, and include it with the document that you file and serve.**

1. Case Name: WILLIE & ORA GREEN v. PG&E CORPORATION

2. Case Number: 19-30088

3. What documents were served?

Opposition to Motion to Dismiss

4. How was the document served? [check one]

- Placed in U.S. Mail
 - Hand-delivered
 - Sent for delivery (e.g., FedEx, UPS)
 - Sent by fax (if the other party has agreed to accept service by fax)

5. Who did you send the document to? [Write the full name and contact information for each person you sent the document.]

US Court

Prime Clerk

KELLER BENVENUTTI KIM LLP

6. When were the documents sent? 10/14/20

7. Who served the documents? [Whoever puts it into the mail, faxes, delivers or sends for delivery should sign, and print their name and address. You can do this yourself.]

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Signature:

Name: Willie Green

Address: 2845 Magnolia Street

Oakland CA 94608

CERTIFICATE OF SERVICE [JDC TEMPLATE Rev. 05/2017]



O Green <orgr53@gmail.com>

driveway replacement/garage floor cracks

alan.gurd@ergeon.com <support@ergeon.com>

Sat, Aug 14, 2021 at 7:21 AM

Reply-To: support@ergeon.com

To: Willie and Ora Green <orgr53@gmail.com>

Good morning Ora, I hope you and Willie are well.

So, apologies for the amount of time it took me to get to this. It has been a very busy period.

In answer to your points.

1. **Total Driveway replacement** - This, in my opinion is the best solution for a number of reasons. Firstly you will achieve a consistent and uniform appearance if everything is the same color. As no 2 x batches of concrete are the same in color.
2. **Quote for replacing 1 of the 4 sections** - we would not be able to provide a quote for this as it would be below our minimum order value/rate, as a large company, we would likely be uneconomical for you.
3. **Repairing the 3 x 5 section** - again, this is below our project minum, and secondly it would look out of place to have a different color slab put in place, as once it dries it will not have the uniform appearance that is normal for driveways, being somewhat like a patchwork quilt.
4. **Replacing the garage floor** - in our opinion this is the best solution as the cracks seem to be of significant enough size to indicate a possible structural failure beneath. As garages are covered areas, they are subject to humidity levels much more than outdoor areas and as such should be in a higher spec concrete along with a vapor barrier, this protects the integrity of the curing concrete and ensures longevity.
5. **Repairing the cracks** - this is not something we would offer or advise. It is poor way to handle the damage and likely only a temporary fix.

I hope these comments/notes are of some help. If you have any other questions or concerns, please reach out to me.
kind regards

—
Alan Gurd

Ergeon Fence and Driveways
650-300-4854



\$8,264**A Area A**

Driveway - 594 sq ft

Area: 594 sq.ft.

- Demo, Excavation and Haul-Away
- Concrete cutting
- Base Material - 2 Inches of Class II Recycled Base Rock
- Rebar - #3 Rebar 18" OC
- Concrete Installation - 4 Inches of 3500 PSI Concrete
- Broom Finish

\$9,870**B Area B**

Garage - 498 sq ft

Area: 498 sq.ft.

- Demo, Excavation and Haul Away
- Base Material - 4 Inches of Class II Recycled Base Rock
- 10 mil Stego Vapor Barrier
- Rebar - #4 Rebar 16" OC
- Concrete Installation - 5 Inches of 3500 PSI Concrete
- Broom Finish

Total: \$18,134* - An additional 2% fee will be added for credit/debit cards